

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	Cr. No. 05-1849 JH
)	
DANA JARVIS,)	
)	
Defendant.)	

UNITED STATES' UNOPPOSED MOTION
FOR EXTENSION OF TIME TO RESPOND TO DEFENDANTS'
OBJECTIONS AND EXCEPTIONS TO THE PRESENTENCE REPORT

The United States hereby moves the Court for an extension of time to respond to the defendant's Objections and Exceptions to the Presentence Report (PSR), filed on February 6, 2009 (Doc. 1539), and in support of its motion states:

1. In his pleading, the defendant makes numerous objections to the PSR. As noted by the defendant, counsel for the government and the defendant previously met regarding the defendant's objections to the PSR and came to an agreement on some of those objections.
2. The parties believe that they can come to an agreement on at least some of the remaining objections, which would obviate the need for resolution of those objections by the court. To that end, a meeting has been scheduled between counsel for the government, counsel for the defendant, and the assigned probation officer for March 10, 2009. The United States would then file its response to any remaining objections by March 13, 2009; Probation would disclose its addendum by that date as well. Thus, this requested extension should not affect the currently scheduled sentencing date of March 24, 2009.

3. Counsel for the defendant, Judith Rosenstein, does not oppose the relief requested in this motion.

WHEREFORE, the United States respectfully requests that the Court grant an extension of time for the filing of its response to the defendant's Objections and Exceptions to the Presentence Report until March 13, 2009.

Respectfully submitted,

GREGORY J. FOURATT
United States Attorney

ELECTRONICALLY FILED

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 20th day of February, 2009, I filed the foregoing pleading electronically through the CM/ECF system, which is designed to cause counsel of record for the defendant to be served by electronic means.

ELECTRONICALLY FILED

JAMES R.W. BRAUN
Assistant U.S. Attorney